



Omaha Public Power District

444 South 16th Street Mall  
Omaha NE 68102-2247

July 10, 1997

LIC-97-0117

U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Mail Station P1-137

Washington, D.C. 20555

- References:
1. Docket No. 50-285
  2. Letter from NRC (A. T. Howe<sup>11</sup>) to OPPD (S. K. Gambhir) dated June 3, 1997
  3. Letter from OPPD (S. K. Gambhir) to NRC (Document Control Desk) dated July 3, 1997

SUBJECT: NRC Inspection Report No. 50-285/97-07, Reply to a Notice of Violation (REVISED)

The subject report transmitted a Notice of Violation (NOV) resulting from an NRC inspection conducted May 5-9, 1997 at the Fort Calhoun Station (FCS). Omaha Public Power District's (OPPD) response, submitted by Reference 3, inadvertently was transmitted with a sentence missing on page 2 of the attachment. Attached is OPPD's response in its entirety.

If you should have any questions, please contact me.

Sincerely,

S. K. Gambhir  
Division Manager  
Engineering & Operations Support

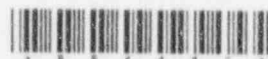
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Attachment

- c:
- Winston and Strawn
  - E. W. Merschoff, NRC Regional Administrator, Region IV
  - L. R. Wharton, NRC Project Manager
  - W. C. Walker, NRC Senior Resident Inspector

170038



NOTICE OF VIOLATION

Omaha Public Power District  
Docket: 50-285  
Fort Calhoun Station  
License: DPR-40

During an NRC inspection conducted on May 5 through May 9, 1997, one violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

10 CFR Part 50, Appendix B, Criterion V, states, in part, ". . . activities affecting quality shall be prescribed by documented instruction, procedures, or drawings, of a type appropriate to the circumstances . . . Instructions, procedures, or drawings, shall include appropriate quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on May 6, 1997, the NRC inspectors discovered that there were no instructions or procedures to ensure that all licensed operators, who were required to wear corrective lenses as a condition of their individual licenses, had corrective lenses of the appropriate type available should these individuals be required to wear self-contained breathing apparatus while performing licensed duties.

This is a Severity Level IV violation. (Supplement 1)(285/97002-01)

OPPD Response

A. Reason for the Violation

The root cause of this violation is that the program for obtaining and maintaining the corrective lenses did not have appropriate administrative processes to ensure compliance with 10 CFR requirements. Additionally, individuals have not been accountable for obtaining and maintaining the spectacle kits if they needed them.

A contributing cause of this violation is that the reduced use of respirators for routine work diminished the attention to the respiratory program and the need to maintain the spectacle kits.

**B. Corrective Steps Which Have Been Taken and the Results Achieved**

1. Two control room operators needed spectacle kits. While these spectacle kits were being obtained, only control room operators who were in compliance with their license requirements were assigned as incident commanders.
2. Radiation Protection form FC-RP-509-2 (R3), "Respirator Fit Test Form," was revised requiring individuals to acknowledge whether they have current corrective lenses for respiratory equipment. This will ensure that if someone needs a spectacle kit, it will be brought to the attention of individual and prompt the spectacle kit to be ordered. This was completed as a means of identifying personnel requiring new corrective lenses. This action was completed on June 13, 1997.
3. Section VII-4, Subsection 9.6, of the Fort Calhoun Safety Manual was revised, adding specific guidance for obtaining corrective lenses for respirators. This action was completed on June 17, 1997.
4. It was verified that licensed operators who are regularly assigned to control room operations that require corrective lenses have either contact lenses or respirator spectacle kits available. This action was completed on June 24, 1997.
5. A list of qualified respiratory equipment users was reviewed. Each individual requiring corrective lenses was identified. If new corrective lenses were required, these lenses have been purchased through the OPPD procurement process. This action was completed on June 30, 1997.

**C. Corrective Steps Which Will Be Taken**

1. The process for obtaining corrective lenses for respiratory

equipment will be included in Level III (Respirator Qualification Training) and in initial General Employee Training. This action will be completed by July 31, 1997.

2. Initial General Employee Training Level III (Respiratory Training) will be incorporated into requalification training along with the process for obtaining a spectacle kit, as defined in the safety manual. This action will be completed by July 31, 1997.

D. Date When Full Compliance Will Be Achieved

OPPD is currently in full compliance.